

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton*  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
*Jennifer L. Brown*  
Attorney-in-Charge

March 30, 2020

By ECF/Email

Honorable Victor Marrero  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/31/2020

Re: United States v. Dragomir Ceranic, 19 Cr. 605 (VM)

Honorable Judge Marrero:

We write on behalf of our client Dragomir Ceranic, with the consent of the Government, and at the recommendation of U.S. Pretrial Officer Leo Barrios, to request that you modify Mr. Ceranic's bond by striking the condition of electronic monitoring. Mr. Ceranic has had no issues on pretrial release since his arrest in early September. He works as a truck driver in the food industry and is therefore an "essential employee" for purposes of our region's current COVID-19-related quarantine. Again, the Government joins in this request, which was prompted by Mr. Ceranic's Pretrial Officer. Thank you for your consideration.

Respectfully submitted,

/s/  
Robert M. Baum  
Ariel Werner  
Assistant Federal Defender  
Federal Defenders of New York  
(212) 417-8770

cc: AUSA Jason Swergold

